



3-4-2008

The Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C.

Dear Secretary,

Ref: Report on Broadcast Localism/Notice of Proposed Rulemaking

There are several issues that this includes and I would like to share with you my thoughts on these.

- First on Advisory Boards and a more formalized system...
- I for one am currently on three local community boards...Clinton Chamber, Clinton Main Street and the Clinton Tourism Association. I also was recently appointed by the Mayor to serve as a Tourism Commissioner reporting to the City Council.
- I have regular meetings with community leaders and hear feedback about concerns constantly. These concerns are brought to our News Director for news and public affairs programs. Having another layer of meetings would complicate my schedule and that of our leaders where our time away from our jobs is stretched now.
- On the Standardized Disclosure Forms for the Public File...this seems to be just added paperwork. In my 30 years in radio and over 20 years in management of stations in Missouri, Virginia, Ohio, New Mexico, Oklahoma, Arkansas and Louisiana...I have had only one person ask to see our public file. Adding to the burden of paperwork that in many cases is never seen does not make sense. We keep accurate records on a form that we have used at many of the stations I have managed. It

P.O. Box 448 or 2201 Antioch Rd. Clinton, MO 64735
Toll Free 866-541-9595 Phone 660-885-6141 Fax 660-885-4801
Email: Sales@kdkd.net Web Site: www.kdkd.net

clearly indicates all the vital information about our efforts for the month/quarter.

- Main Studios...I am not directly effected by this at this time...however, we may be soon adding another station in a very small market near us. This new station will require all new equipment and studios/offices within our current facilities. If I were required to build or locate suitable offices/studios in the city of license for this new station, the costs, especially in the first few years may put an extreme burden on our sales department to develop enough revenue to be successful. Nothing would be worse than to promise a new community their first radio station and then only after investing thousands of dollars and thousands of hours of work have to sell or go dark due to the inability to handle the enlarged budget expenses.
- I know of several broadcasters I spoke with during the recent NAB Leadership Conference in Washington that they would be really hurt if they had to “re-locate” some of their stations back out to the cities of license. In some cases, those small towns are nothing but a crossroads with one service station and many don’t even have a post office anymore. This move back to main studios will put many broadcasters in a very serious financial situation having to not only expense/capitalize new buildings but all the personnel required to man those facilities under the proposed ruling.

As for programming locally, again the expense of having to add 3-5 per station would cripple us financially. The salaries and benefits for those 6-10 new people would place us and all broadcasters in a situation where our rates would have to be raised substantially and that would be a hard sell. “Mr. Advertiser...our rate is now \$45 per spot...What? Yes, we had to raise our rates to cover our expense of 10 new radio broadcasters required by the FCC. We really want you to continue to advertise and we realize this is a dramatic increase from the \$10 you are paying now...but that’s the way it is...now let’s talk about copy....COPY? We won’t need copy...because I cannot afford this anymore....”

Please understand that the majority of small market broadcasters DO SERVE their local communities very well. We take extra steps to be on guard when the weather turns bad...we have local contacts with shared email and cell phone numbers...the Sheriff actually calls our News Director at home if there is something going on that he thinks we need to know about and share with our audience. Big city broadcasters I’m sure do the best they can as well to serve the public interest. When we have a weather or other situation that requires “LIVE LOCAL” programming...we interrupt what

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ever is on the air at the time...music, NASCAR, ballgame...a Presidential address...taking care of our local people is what we do.

If one broadcaster falls down on the job...we should not all be punished with additional rules, procedures and paperwork. That one station should be cited and then a procedure for correction should be set forth. All the apples are not bad...when one makes a mistake.

Bob May

Bob May, CRME, CRMC

VP/GM